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July 19, 2021

Via ECF Only

Honorable Paul Crotty
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY. 10007

7/21/21
The sentence will be adjourned to September 23, 2021
at 12pm
So ordered
Paul A. Crotty
USDC

Re: U.S. v. Zhen, et. Al.
Case 20-cr-56(PAC)

Your Honor,

My office represents Mr. Guzman, a defendant in the above referenced matter. My office is still working on gathering materials and producing our sentencing submissions and because of COVID restrictions and working with a Spanish Interpreter it has been difficult finding sufficient time to time to help my client organize his statement to the Court. I write on behalf of my client, to **respectfully request a postponement of the sentencing hearing until after September 16, 2021 and an extension of time for the Defense to file our sentencing submissions.** I have conferred with the counsel for the Government and they agree to the proposed extension of time.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court. The Court's consideration of this request is respectfully appreciated. Thank you.